

1 GREENBERG TRAURIG, LLP
2 Ginger Pigott (SBN 162908)
3 Amy B. Alderfer (SBN 205482)
4 Email: pigottg@gtlaw.com; alderfera@gtlaw.com
5 1840 Century Park East, Suite 1900
6 Los Angeles, CA 90067
7 Tel: (310) 586-7700; Fax: (310) 586-7800
8 Attorneys for Defendant Teva Pharmaceuticals, USA, Inc.

7 KHORRAMI, LLP
8 Amanda J. Greenburg
9 Email: agreenburg@khorrami.com
10 360 22nd Street, Suite 640
11 Oakland, CA 94612
12 Tel: (866) 546-7266
13 Attorneys for Plaintiffs

12 *(additional counsel indicated on next page)*

14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**

17 JUANA JASMIN, et al.,) CASE NO. 3:12-cv-2820-WQH-NLS
18 Plaintiffs,) JUDGE: Hon. William Q. Hayes
19 vs.) JOINT MOTION TO EXTEND
20) DEFENDANTS' TIME TO RESPOND
21 MCKESSON CORPORATION, et al.,) TO PLAINTIFFS' COMPLAINT
22 Defendants.) PENDING RESOLUTION OF
23) MOTION TO REMAND
24)

25
26
27
28

JOINT MOTION TO EXTEND TIME FOR RESPONSE TO COMPLAINT

1 GOODMAN NEUMAN HAMILTON, LLP

2 Pavan Rosati

3 Email: prosati@gnhllp.com

4 417 Montgomery Street, 10th Floor

5 San Francisco, CA 94104

6 Tel: (415) 705-0400; Fax: (415) 705-0411

7 Attorneys for Defendant McKesson Corporation

8 LECLAIRRYAN LLP

9 Brian S. Inamine

10 E-Mail: Brian.inamine@leclairryan.com

11 888 South Figueroa, Suite 1800

12 Los Angeles, CA 90017

13 Tel.: (213) 488-0503; Fax: (213) 624-3755

14 Attorneys for Defendant Watson Pharmaceuticals, Inc.

15 GORDON & REES, LLP

16 Kai Peters

17 E-Mail: kpeters@gordonrees.com

18 275 Battery Street, Suite 2000

19 San Francisco, CA 94111

20 Tel.: (415) 986-5900; Fax: (415) 986-8054

21 Attorneys for Defendants Cornerstore Biopharma, Inc., and Cornerstore Biopharma
22 Holdings, Inc.

23 Kenneth M. Seeger (State Bar No. 135862)

24 kseeger@seegersalvas.com

25 Adam R. Salvas (State Bar No. 191379)

26 asalvas@seegersalvas.com

27 SEEGER SALVAS LLP

28 455 Market Street, Suite 1530

San Francisco, CA 94105

Telephone: (415) 981-9260

Facsimile: (415) 981-9266

Attorneys for Defendants Vintage Pharmaceuticals, LLC;

Generics International (US), Inc.; Generics Bidco I, LLC;

Generics Bidco II, LLC; Generics International (US Parent), Inc.;

Endo Pharmaceuticals Inc.; and Endo Pharmaceuticals Holdings Inc.

1 WHEREAS, Plaintiffs' Complaint was filed in Imperial County Superior Court
2 on November 15, 2012;

3 WHEREAS, this action was removed by Defendant Teva Pharmaceuticals
4 USA, Inc., to the United States District Court for the Southern District of California
5 on November 21, 2012 [Docket No.1];

6 WHEREAS, Plaintiffs filed a Motion to Remand on December 28, 2013
7 [Docket No. 20], and a hearing on Plaintiffs' Remand Motion was set for February 4,
8 2013;

9 WHEREAS, the Court's ruling on Plaintiffs' Remand Motion has been taken
10 under submission.

11 WHEREAS, various defendants have been served in the intervening time period
12 with response deadlines likely to occur prior to the ruling on the pending motion to
13 remand;

14 IT IS HEREBY AGREED AND STIPULATED by and between Defendants
15 and Plaintiffs, through their respective attorneys of record, that:

- 16 1. In the interest of judicial economy, and upon the Court's entry of an order
17 upon this Joint Motion (Proposed Order submitted concurrently herewith),
18 any Defendants who have an upcoming deadline to respond to the Complaint
19 shall have that deadline continued until thirty (30) days after the entry of any
20 court order denying Plaintiffs' Motion to Remand. If Plaintiffs' Remand
21 Motion is granted, the parties agree that the time for Defendants to respond
22 to the Complaint shall be governed by the California Code of Civil
23 Procedure, stipulation of counsel, and/or other court order.

1 Dated: April 4, 2013

By: /s/ Ginger Pigott
Ginger Pigott
GREENBERG TRAURIG, LLP
Attorneys for Defendant,
TEVA PHARMACEUTICALS USA, INC.

6 Dated: April 4, 2013

By: /s/ Amanda J. Greenburg
Amanda J. Greenburg
KHORRAMI, LLP
Attorneys for PLAINTIFFS

9 Dated: April 4, 2013

By: /s/ Pavan Rosati
Pavan Rosati
GOODMAN NEUMAN HAMILTON, LLP
Attorneys for Defendant,
MCKESSON CORPORATION

13 Dated: April 4, 2013

By: /s/ Brian S. Inamine
Brian S. Inamine
LECLAIRRYAN LLP
Attorneys for Defendant,
WATSON PHARMACEUTICALS, INC.

17 Dated: April 4, 2013

By: /s/ Kai Peters
Kai Peters
GORDON & REES LLP
Attorney for Defendant Cornerstone
BioPharma, Inc. and Cornerstone BioPharma
Holdings, Inc.

1 Dated: April 4, 2013

By: /s/ Adam R. Salvas
Adam R. Salvas
SEEGER SALVAS LLP
Attorneys for Defendants Vintage
Pharmaceuticals, LLC;
Generics International (US), Inc.; Generics
Bidco I, LLC;
Generics Bidco II, LLC; Generics International
(US Parent), Inc.;
Endo Pharmaceuticals Inc.; and Endo
Pharmaceuticals Holdings Inc.

10 **Signature Attestation**

11 *I hereby attest that I have the authorization of all parties, as indicated by the*
12 *conformed signatures (/S/), to file the foregoing document.*

13 /s/ Amy B. Alderfer